

CSD 1182 [05/19/17]  
Name, Address, Telephone No. & I.D. No.  
Michelle R. Ghidotti-Gonsalves, SBN 232837  
The Law Offices of Michelle Ghidotti  
5120 E. La Palma Ave., Ste. 206  
Anaheim Hills, CA 92807  
949-354-2601

**UNITED STATES BANKRUPTCY COURT**  
SOUTHERN DISTRICT OF CALIFORNIA  
325 West F Street, San Diego, California 92101-6991

In Re  
Cipriano Gonzalez Marquez and Josefina Beltran Marquez

BANKRUPTCY NO. 16-00232-MM13

Tax I.D.(EIN)#: \_\_\_\_\_ /S.S.#:XXX-XX- 8498 Debtor.

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY**

TO: David L. Skelton, Chapter 13 Trustee; Cipriano Gonzalez Marquez, Debtor; and Josefina Beltran Marquez, Joint Debtor;

You are herewith served with the attached Motion by Bosco Credit II Trust Series 2010-1 , Movant,  
for: Relief from the Automatic Stay

and any accompanying declarations.

If you object to the Court granting the relief requested in the Motion:

1. **You are required** to obtain a hearing date and time from the appropriate Courtroom Deputy for the judge assigned to this bankruptcy case. Determine which deputy to call by looking at the Bankruptcy Case No. in the above caption of this notice. If the case number is followed by the letters:

|   |    |   |                     |   |                             |
|---|----|---|---------------------|---|-----------------------------|
| - | MM | - | call (619) 557-7407 | - | DEPARTMENT ONE (Room 218)   |
| - | LA | - | call (619) 557-6594 | - | DEPARTMENT TWO (Room 118)   |
| - | LT | - | call (619) 557-6018 | - | DEPARTMENT THREE (Room 129) |
| - | CL | - | call (619) 557-6019 | - | DEPARTMENT FIVE (Room 318)  |
2. **Within fourteen (14)<sup>1</sup> days from the date of service of the motion**, you are further required to serve a copy of your **Declaration in Opposition to Motion** and separate **Request and Notice of Hearing** [Local Form CSD 1184<sup>2</sup>] upon the undersigned moving party, together with any opposing papers. The opposing declaration must be signed and verified in the manner prescribed by FRBP 9011, and the declaration must:

<sup>1</sup>Depending on how you were served, you may have additional time for response. See FRBP 9006.

<sup>2</sup>You may obtain Local Form CSD 1184 from the office of the Clerk of the U.S. Bankruptcy Court.

- a. identify the interest of the opposing party; and
  - b. state, with particularity, the grounds for the opposition.
3. **You must** file the original and one copy of the Declaration and Request and Notice of Hearing with proof of service with the Clerk of the U.S. Bankruptcy Court at 325 West F Street, San Diego, California 92101-6991, no later than the next business day following the date of service.

**If you fail to serve your "Declaration in Opposition to Intended Action" and "Request and Notice of Hearing" within the 14-day<sup>1</sup> period provided by this notice, no hearing will take place, you will lose your opportunity for hearing, and the debtor or trustee may proceed to take the intended action.**

DATED: 6/30/2017

/s/ Michelle R. Ghidotti-Gonsalves

Attorney for Moving Party

### CERTIFICATE OF SERVICE

I, the undersigned whose address appears below, certify:

That I am, and at all relevant times was, more than 18 years of age;

That on 30th day of June, 2017, I served a true copy of the within NOTICE OF MOTION, together with the following pleadings [describe any other papers]:  
Motion for Relief from Automatic Stay; and Declaration in Support of Bosco Credit II-2 LLC's Motion for Relief from the Automatic Stay

by [describe here mode of service]:  
First Class Mail

on the following persons [set forth name and address of each person served] and/or as checked below:



Attorney for Debtor (if required):

Debtor: Cipriano Gonzalez Marquez, 6081 Flipper Drive, San Diego, CA 92114

Joint Debtor: Josefina Beltran Marquez, 6081 Flipper Drive, San Diego, CA 92114

Debtors' Counsel: Kerry A. Denton, 231 Fourth Avenue, Chula Vista, CA 91910



For Chpt. 7, 11, & 12 cases:

UNITED STATES TRUSTEE  
Department of Justice  
880 Front Street, Suite 3230  
San Diego, CA 92101-8897



For ODD numbered Chapter 13 cases:

THOMAS H. BILLINGSLEA, JR., TRUSTEE  
401 West A Street, Suite. 1680  
San Diego, CA 92101



For EVEN numbered Chapter 13 cases:

DAVID L. SKELTON, TRUSTEE  
525 B Street, Suite 1430  
San Diego, CA 92101-4507

I certify under penalty of perjury that the foregoing is true and correct.

Executed on 6/30/2017

/s/ Jeremy Romero

(Typed Name and Signature)

5120 E. La Palma Ave., Ste. 206

(Address)

Anaheim Hills, CA 92807

(City, State, ZIP Code)